

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

OMEGA SA and SWATCH AG,

Plaintiffs,

-against-

375 CANAL, LLC, JOHN DOES 1 – 50 and  
XYZ COMPANIES 1 – 50,

Defendants.

Civil Action No.:  
12-CV-6979 (PAC)

**NOTICE OF MOTION**  
**[Plaintiffs' First Motion in Limine]**

PLEASE TAKE NOTICE that, upon the Declaration of Joshua Paul executed August 4, 2017 and the exhibits annexed thereto, Plaintiffs will move this Court, before the Hon. Paul A. Crotty in Courtroom 14C of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order, pursuant to Fed. R. Civ. P. 37(c)(1):

1. Precluding Defendant from calling any witnesses at trial; or, in the alternative,
2. Directing that Defendant forthwith provide Plaintiffs with a list of trial witnesses and that Defendant make its witnesses available to Plaintiffs for depositions reasonably in advance of trial.

Dated: Ossining, NY  
August 4, 2017

COLLEN

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